

ARNG Compliance-Related Cleanup Program



Army Environmental Cleanup Workshop
San Antonio, Texas
January 2006

ARNG Compliance-Related Cleanup Program

- Liabilities
- CC Overview/Highlights
- 2006 Spring Datacall/AAA Audit/IAP Workshops
- NGB Funding Policy
- CC Requirements/CC FY06 Budget Update

Why do we have a CC Program?

- IG Audit
 - Deficiencies on financial statements – did not account for all environmental liabilities
 - CC is a portion of the environmental liabilities
 - Required the Army to organize and formalize the process of cleaning up non-DERP sites
 - Applies to all of DoD – DoD Guidance for Recognizing, Measuring, and Reporting Environmental Liabilities Not Eligible for Defense Environmental Restoration Funding or “Non-DERP Guidance”
 - Qualified audit by FY07 (spring FY06 data)

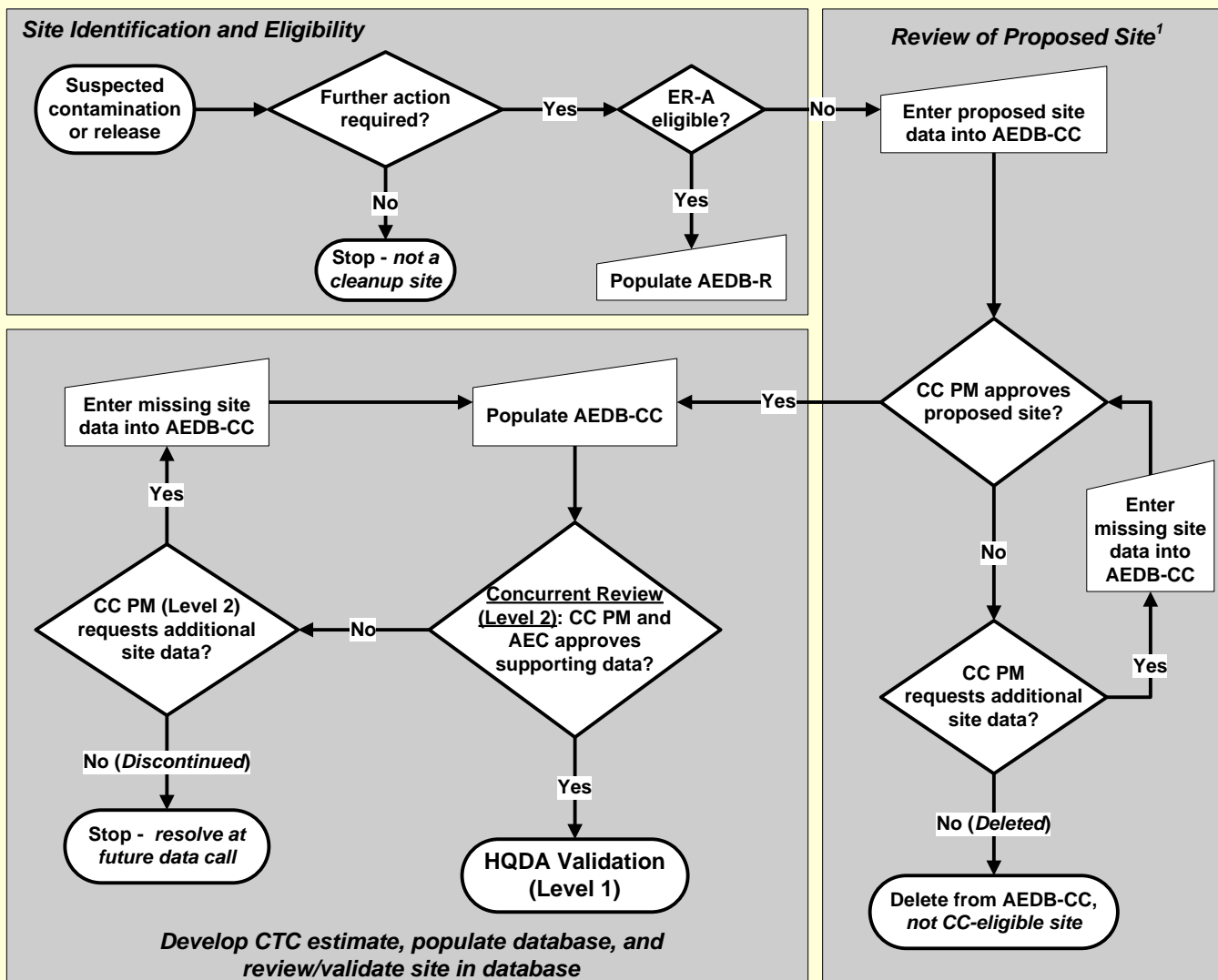
What is an environmental liability?

- FMR Volume 4, Chapter 13 defines Environmental Liability:
“An **environmental liability** is a probable and measurable future outflow or expenditure of resources that exists as of the financial reporting date for environmental cleanup costs resulting from past transactions or events.”

Why does my CTC estimate have to go to site closeout?

- Must capture the complete liability
- Essential for POM build
 - CC portion of VENC funding is estimated for POM from AEDB-CC
 - “EPR” model
 - AEDB-CC

CC Process



¹ Approval level for proposed sites is determined by the Command Structure

CC Overview/Highlights

- Eligibility
 - Ownership/timeframe contamination occurred
 - IRP vs. CC program
 - Proof of a release
 - Sample analysis results above a regulatory limit
 - Documented proof of a release – spill reports, an EPAS finding, documented proof of past practices which caused a release, etc.
 - Visual documentation – photos of stains and an MFR explaining the assumed type of contamination.
 - Documented interviews with past employees or Army personnel.

CC Overview/Highlights

- Eligibility
 - Not Eligible
 - Preliminary Assessments
 - Initial Spill Response Actions
 - Permitted monitoring without a documented release (landfills)
- Fund Code
 - OMNG ENV
- MDEP
 - VENC

CC Overview/Highlights

- Create a proposed site in the database
 - Site ID
 - ARNG (CCSTXXXXXX)
 - Narrative
 - Historic Site Narrative
 - Regulatory Program
- Submit to CC PM for approval
 - CC PM checks site eligibility for CC program

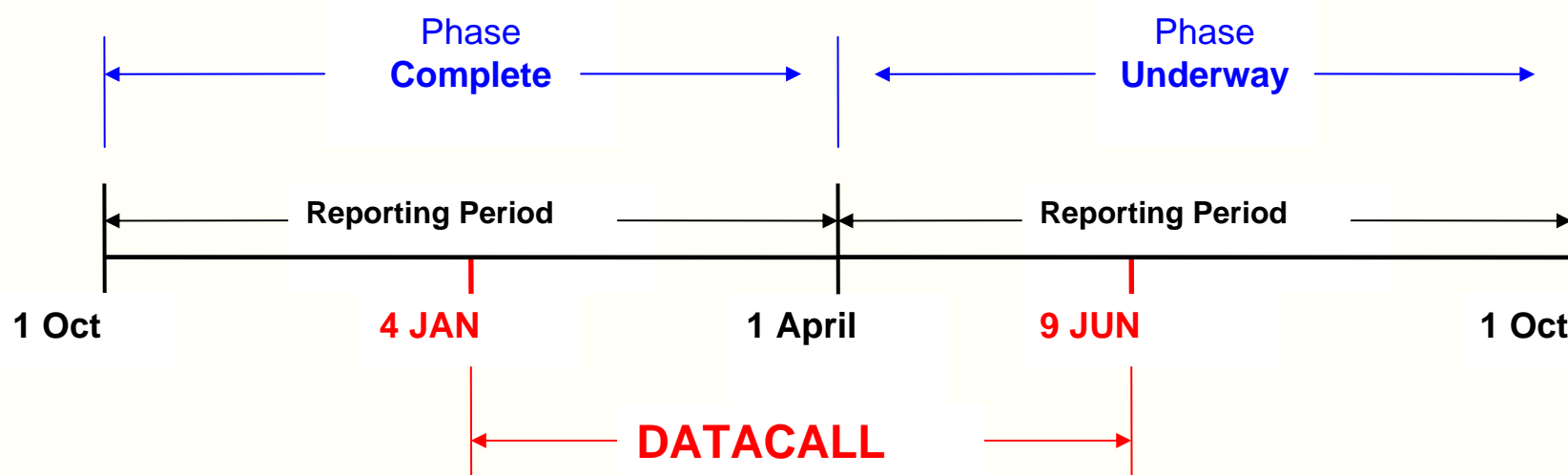
CC Overview/Highlights

- Minimum Narrative Requirements
 - Site Conditions
 - Type and level of contamination
 - Reason for action (regulatory driver)
 - Key documents
 - Potential for offsite migration
 - Proposed Actions (Cleanup Strategy)
- Historic Site Narrative Requirements
 - When contamination discovered/occurred
 - Past uses/operations and occupants
 - Environmental history, investigations, cleanup actions, etc.

CC Overview/Highlights

- Phase Schedule
 - Cleanup strategy
 - Phase names determined by statute
 - Reporting Period
 - 1 Oct – 31 Mar
 - 1 Apr – 30 Sep
-

Reporting Periods



CC Overview/Highlights

- Estimate Source/Documentation
 - RACER (prior to FS (or equivalent))
 - RACER and Contract/Proposal
 - Contract/Proposal
 - Must upload proposal
 - Dollar value on proposal should match AEDB-CC
 - Similar Sites
 - Monitoring
 - Abandoning wells
 - Actual Costs
 - Two years of operations/LTM

CC Overview/Highlights

- RACER
 - Initial CTC estimate
 - Certificate on file
 - Keep .mdb file on CD or harddrive
 - Technology value must be over 1k
 - Phase names must match for proper import
 - Update to 2006 version
 - IAP contractor update/call Earthtech
 - RACER Summary Report used as MFR

RACER Hints

- Exporting and uploading .mdb file
 - Rt. click on project (grey arrow)
 - Choose export project
 - Choose “yes” run template compactor
 - Click “ok” markup costs in use
 - Click “close”
 - Name and save project on hard drive
 - Upload file into AEDB-CC

RACER Hints

- Importing .csv file
 - Click Utilities on top menu bar
 - Choose Agency Post Processors
 - Army Interface Utility
 - In upper right hand corner of box – Choose “Comma separated file”
 - Double click project folder
 - Double click project
 - Highlight site (green tree)
 - Click “Export to .csv”
 - Save file on hard drive
 - Import into AEDB-CC from Cost Estimate Detail Sheet

RACER/Contract Proposal Hints

- Choose RACER estimate source
- Import RACER Estimate (.csv file)
- Modify required and programmed funding spreads with default spread
- Change estimate source to Other
- Manually adjust funding spreads to desired spread
- Upload .mdb file and contractor proposal

CC Overview/Highlights

- **MFR Requirements (Two signatures)**
 - Background Information (Should be same as historic narrative)
 - Cleanup Strategy
 - Assumptions
 - Calculation Summary
 - Quantities
 - Cost per Unit
 - Other Cost Elements (Utilities, etc.)
 - Project Changes
 - Cost Adjustments (material change >10%)

CC Overview/Highlights

- MFR Requirement Details
 - Background information
 - Must contain data/facts needed to identify the conditions surrounding the project.
 - Cleanup Strategy
 - Clearly explain the assumed approach to reach RIP/RC based on current information.
 - Assumptions
 - Items that were unknown at the time of estimate development, but that the installation needed to complete the estimate.

CC Overview/Highlights

- MFR Requirements Details
 - Calculations
 - If using a contract or proposal that covers multiple sites or that has multiple alternatives for cleaning the site; must specify which alternative and which costs were used and why. Show calculations.
 - If historic costs were used, show calculations used to escalate costs to current year dollars.
 - Quantities
 - Samples (Ex: Four years of quarterly sampling for 10 wells equals the total 160 samples required.)
 - Excavation volume (Ex: Based upon knowledge of the site, it is assumed that 139CY of soil will be excavated from an area 10ftX15ftX25ft.)

CC Overview/Highlights

- Program Management Costs

Salaries and benefits (FTE and dollars)	Costs for government employees to manage the CC program at the installation level. The FTE is entered into the database of record as a fraction of or whole man-year (e.g., 0.25 for one quarter of an FTE).
Training (dollars)	Costs for professional development related to the CC program.
Travel (dollars)	Travel to attend meetings and training associated with the CC program
Document review and associated fees (dollars)	Fees charged by regulators for review of site-specific documents as required
Contract Support (this NOT for site project execution) (dollars)	Costs for contract support to manage the CC program at the installation level
Administrative/record keeping (dollars)	Includes installation administrative and record keeping costs
Other (dollars)	Covers other costs (e.g., IT support, security for excess properties if required)

a1

Click on PMC link first before moving to right to choose individual sections. Must identify fund code. If you don't do this, it will not let you enter PMC.

alexandria.long, 1/27/2006

CC Overview/Highlights

- Supervisory Review Checklist
 - Must be signed by Chief of Staff or designee
 - Must have Environmental Liabilities training
- QC checklist
 - Used by NGB to evaluate CC projects for approval
- QA
 - Performed by USAEC

CC Overview/Highlights

- Additional Points
 - Data must be consistent throughout AEDB-CC and the IAP and must be supported with documentation
 - Do not use “reopened narrative”
 - Break sites into pieces if possible due to limited funding in FY06 and FY07
 - Call if you need assistance

2006 Spring Datacall Information/Requirements

- Datacall open 4 JAN – 9 JUN
- Data will be audited by the Army Audit Agency
 - Site visits possible
 - Estimate file for each site
- MFR is required for each site
- Signatures on each document must be up to date (within one year of beginning of datacall)
- Update your Cost Estimate Detail Sheet
- Move funding from out-years into FY13

IAP Workshops

06-07 FEB	TX
08-09 FEB	UT/NM
23-24 FEB	MI
27 FEB - 03 MAR	AK
14-15 MAR	CT
16-17 MAR	RI
20-21 MAR	PA

23-24 MAR	NY
04-06 APR	NJ
11-12 APR	IA
13-14 APR	NE
28 APR	HI
27-28 APR	MA
01-02 MAY	OR

NGB CC Funding Policy

NGB CC Funding Policy:

- Receiving funds
 - NGB Funding Policy
 - Contractor proposal/contract required
 - CC funds are limited to CC sites
 - Approved Site in the Database
 - Limited availability of funds FY06 and FY07

Total CC Requirements

STATE	2006	2007	2008	2009	2010	2011	2012	Out Years
AK			4007	3231	933	610	647	11556
AL	272	16	16	16	16			
AZ	456	279	545	72	107	71	106	280
CA	1332	1624	1518	1311	1245	805	478	1243
CT	203	617	615	72	51	50	56	635
FL	11	1793	1917	1744	1644	1544	1443	1463
HI	4196	280	101	100	100	100		
IA	19	66	10	11	12	12	16	13
IN	17	17	17	17	17			
MA	60	60	60	60	60	60	60	120
MN	8	8	35					
MO	166	49						
NC	689	446	321	687	577	268		
NE	140	120	2	19	11			
NM	36	764	387	453	80	59	58	816
NY	12	12	12	12	12	2	2	6
OH	707							
OR	1796	338	2848	759	369	369	293	1677
PA	165	107	21	9	19			
RI	75	28	4	14				
SC	138	9	9	9	9	9	9	205
TX	226	110	1091	12	12	17		
UT			831	54	134	184	71	146
WV	9							
Total (k)	10,733	6,743	14,367	8,662	5,408	4,160	3,239	18,160